

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JENNAYA BENNETT-WERRA,)
Plaintiff,)
)
 v.)
)
 STEVEN TOMPKINS, et al.,)
Defendants.)

Civil Action No. 1:20-cv-10017-ADB

MOTION TO DISMISS BY DEFENDANT NAPHCARE, INC.

Defendant NaphCare, Inc., by counsel, moves that the complaint be dismissed pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief may be granted. In support of this motion, Defendant NaphCare, Inc. submits the accompanying memorandum of law.

Respectfully submitted,

Defendant NaphCare, Inc.,
By its attorney,

/s/ William D. Saltzman
William D. Saltzman, BBO #439749
Victor Koufman, BBO #545296
KOUFMAN & FREDERICK, LLP
145 Tremont Street, 4th Floor
Boston, MA 02111
(617) 423-2212
ws@kflitigators.com

Dated: June 29, 2020

CERTIFICATE OF SERVICE

I, William D. Saltzman, certify that on the 29th day of June, 2020, a copy of the above pleading was filed with the ECF System and sent electronically to the registered participants identified on the Notice of Electronic Filing, with paper copies being sent to those indicated as non-registered participants.

/s/ William D. Saltzman
William D. Saltzman